

1 DOCUMENTS THAT SHOULD HAVE BEEN GIVEN TO US
2 BEFORE THAT THERE ARE MORE QUESTIONS THAT HAVE
3 TO BE ASKED.

4 THE WITNESS: ALL RIGHT.

5 MR. ZALL: HOPEFULLY, THAT WE
6 WON'T HAVE TO. IT WOULD BE NICE IF WE DIDN'T
7 HAVE TO. BUT, WE WILL TAKE THE PROPER AVENUES
8 TO SEEK THE DOCUMENTS FROM YOU. OKAY? I
9 THINK, THOUGH, IT'S UNDERSTOOD TODAY THAT WE
10 DID NOT GET ALL THE DOCUMENTS WE ASKED FOR.
11 YOU HAVE YOUR REASONS, BUT SUFFICE IT TO SAY
12 THAT THERE ARE MANY DOCUMENTS THAT WERE NOT
13 PROVIDED TO US THAT WE HAVE A RIGHT TO SEE IN
14 THIS LAWSUIT.

15 HAVING SAID THAT, WE ARE GOING
16 TO SUSPEND AT THIS TIME, AS OPPOSED TO
17 TERMINATING THE DEPOSITION, OKAY, PENDING OUR
18 REVIEW OF ADDITIONAL DOCUMENTS.

19 THE WITNESS: OKAY.

20 MR. ZALL: OKAY?

21 THE WITNESS: YEAH.

22 I'M GONNA--

23 JUST FOR THE RECORD, I'M GONNA
24 MAKE ALL THE NEWSPAPERS AVAILABLE TO YOU BY

1 NEXT WEEK, CERTIFIED-- CERTIFIED MAIL.

2 MR. MACHANIC: HOW ABOUT YOUR
3 TAX RETURNS?

4 THE WITNESS: YEAH.

5 Q (BY MR. ZALL) AND THE OTHER DOCUMENTS THAT
6 DEAL WITH YOUR COMPLAINT, YOUR JOB SEARCH
7 ACTIVITIES, ALL OF THE DOCUMENTS THAT YOU'VE
8 TESTIFIED TODAY THAT YOU HAVE KEPT COPIES OF,
9 THAT WE DO HAVE A RIGHT TO. WE HAVE ASKED
10 FOR-- A VERY BROAD QUESTION, WHICH IS ALL OF
11 YOUR ANSWERS TO YOUR INTERROGATORIES. WE NEED
12 TO SEE ALL OF THOSE, AND YOUR BACKUP DOCUMENTS
13 AS WELL.

14 THE WITNESS: OKAY.

15 MR. ZALL: SO, I THINK THAT'S
16 VERY IMPORTANT.

17 THANK YOU.

18 MR. MACHANIC: SPECIFICALLY,
19 YOU ALSO TALK ABOUT YOUR RESUME. SO, WHATEVER
20 RESUMES YOU HAVE IN YOUR POSSESSION, WE WANT
21 COPIES OF ALL OF THEM. NOT JUST CURRENT
22 RESUMES, BUT ALL THE WAY BACK.

23 THE WITNESS: YEAH. PROVIDED
24 IF I HAVE THE OLD ONES,-- I DON'T KNOW.